

UNITED STATES DISTRICT COURT  
for the  
Southern District of Indiana

United States of America )  
v. )  
DEMETRIUS JACKSON ) Case No. 1:21-mj-0093  
 )  
 )  
 )  
 )

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 29, 2021 in the county of Marion in the  
Southern District of Indiana, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
21 USC 841(a)(1)	Possession with Intent to Distribute a Detectable Amount of Marijuana
18 USC 924(c)	Possession of a Firearm in Furtherance of Drug Trafficking
18 USC 922(g)(1)	Previously Convicted Felon in Possession of a Firearm

This criminal complaint is based on these facts:

Continued on the attached sheet.

/s/ Todd Bevington

*Complainant's signature*

Todd Bevington, ATF Special Agent

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by \_\_\_\_\_  
telephone \_\_\_\_\_ (reliable electronic means)

Date: 1/29/2021

City and state: Indianapolis, Indiana

Tim A. Baker  
United States Magistrate Judge  
Southern District of Indiana

**AFFIDAVIT IN SUPPORT OF**  
**APPLICATION FOR CRIMINAL COMPLAINT**

1. I, Todd J. Bevington, am a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) and have been so employed since December of 2013. Prior to ATF, I was a police officer and detective with the Richmond, Virginia, Police Department for over thirteen years. I graduated from the Federal Law Enforcement Training Center and am currently assigned to the ATF-Indianapolis Field Office. I have participated in numerous state and federal firearms and narcotics investigations.

2. This affidavit is submitted in support of a criminal complaint charging Demetrius JACKSON a/k/a Meechie (date of birth XX/XX/1995) with possession with intent to distribute marijuana, in violation of Title 21, United States Code, Section 841(a)(1); possession of a firearm in the furtherance of a drug trafficking crime, in violation of Title 18, United States Code, Section 924(c); and possession of a firearm and/or ammunition by a prohibited person, in violation of Title 18, United States Code, Section 922(g)(1). The information contained in the below numbered paragraphs is either personally known to your Affiant or told to your Affiant by other law enforcement officers.

**Facts Supporting Probable Cause**

3. On January 29, 2021, investigators executed a search warrant at a residence on Albany Street, Indianapolis, Indiana; located within the Southern District of Indiana. Through my investigation, I was aware that JACKSON resided

at the residence, and was the target of the search warrant. JACKSON was detained at the residence by investigators upon investigators' execution of the search warrant.

4. While searching the residence, investigators located two firearms, approximately ten pounds of suspected marijuana,<sup>1</sup> and approximately \$10,000 of currency. From my training and experience, ten pounds of marijuana is commensurate with distribution, rather than personal consumption.

5. When JACKSON's bedroom was searched, investigators located a loaded 9 millimeter firearm affixed via a magnetic holster to the headboard of JACKSON's bed. Investigators found the \$10,000 in U.S. Currency behind the bed, approximately a foot from the loaded firearm, and also located one of the ten pounds of marijuana in that room (with the other nine pounds being seized from the basement of the residence).

6. JACKSON was advised of his *Miranda* warnings and voluntarily agreed to speak with investigators. JACKSON stated he had been selling marijuana his whole life and was currently selling marijuana to pay his bills. As such, through my training, experience, and involvement in this investigation, I believe that the \$10,000 in U.S. Currency was likely proceeds from JACKSON's drug trafficking business.

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<sup>1</sup> I believe the suspected marijuana is actual marijuana, a Schedule I Controlled Substance, based on the appearance of odor. I have been involved in several hundred cases where marijuana has been recovered and therefore I am familiar with the appearance, odor, and packaging of marijuana. The recovered drug exhibits were submitted to the Marion County-Indianapolis Forensics Services Agency Laboratory for official analysis.

7. JACKSON acknowledged there were numerous pounds of marijuana in the residence as well as two firearms. JACKSON stated the firearms were for his protection because he had previously been shot and stated he was worried about individuals breaking into his residence. JACKSON further acknowledged he had been convicted of numerous felony offenses and was aware he was prohibited from possessing firearms.

8. From my training and experience, I know that individuals who engage in the ongoing sales of controlled substances frequently possess firearms to protect themselves, their drugs, and their drug proceeds. They also routinely possess these firearms at locations where they possess or sell their drugs, or where they keep their drug proceeds (such as JACKSON keeping a loaded firearm in close proximity to his marijuana and suspected drug proceeds).

9. A computerized criminal history check (CCH) of JACKSON showed JACKSON had sustained numerous felony convictions in Indiana, to include: battery resulting in bodily injury under cause #49G02-1405-FC-025910.

10. An interstate nexus expert with ATF reviewed the firearms characteristics and determined that the firearms (the loaded 9 millimeter handgun described above, and a rifle found in the kitchen of the residence) were not manufactured in the state of Indiana. By virtue of their presence in the State of Indiana, therefore, the firearms had to have been transported or shipped in interstate or foreign commerce

### Conclusion

11. Based on the facts set forth in this affidavit, your Affiant submits that probable cause exists that on January 29, 2021, in the Southern District of Indiana, Demetrius JACKSON, having been convicted of numerous crimes punishable by imprisonment for a term exceeding one year, did knowingly possess firearms, said firearms having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1). I further submit that JACKSON possessed these firearms in the furtherance of a drug trafficking crime in violation of Title 18, United States Code, Section 924(c), and also possessed with intent to distribute marijuana, in violation of Title 21, United States Code, Section 841(a)(1). I respectfully request this Court issue a Criminal Complaint charging JACKSON accordingly, along with a warrant for his arrest.

/s/ Todd Bevington  
Todd Bevington, Special Agent  
Bureau of Alcohol, Tobacco, Firearms, and Explosives

Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by telephone.

Date: 1/29/2021

Tim A. Baker  
United States Magistrate Judge  
Southern District of Indiana

